

EXHIBIT 2a

EXHIBIT 2a

FILED
SAN MATEO COUNTY

JUL 12 2018

Clerk of the Superior Court
By [Signature]
DEPUTY CLERK

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Attorneys for Plaintiff and the Proposed Class

18 - CIV - 03639
CMP
Complaint
1258513



SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN MATEO

CECELIA ANNE PERKINS,
individually, as Trustee of the CECELIA
ANNE PERKINS LIVING TRUST
DATED JANUARY 6, 2016, and on
behalf of all others similarly situated,

Plaintiff,

v.

QUICKEN LOANS, INC., a California
corporation,

Defendant.

Case No. **18 CIV 03639**

CLASS ACTION

COMPLAINT
FOR VIOLATION OF CAL. CIV.
CODE § 2941, ET. SEQ.

DEMAND FOR JURY TRIAL

BY FAX

1 Plaintiff Cecelia Anne Perkins ("Plaintiff"), by her attorneys, The Richman Law Group and
2 Finkelstein, Blankinship, Frei-Pearson & Garber, LLP, as and for her class action complaint against
3 defendant Quicken Loans, Inc. ("Defendant"), alleges as follows:

4 **NATURE OF THE CASE**

5 1. This action seeks to redress the systematic failure of Defendant to timely present to
6 California county recorders proof that deeds of trust have been satisfied.

7 2. Defendant is the largest residential mortgage lender in the United States.

8 3. Despite lending more money to home purchasers than any other company, it is unable to
9 comply with the simple, but crucial, responsibility of filing reconveyance documents with county
10 recorder offices after obligations secured by deed of trusts are paid off.

11 4. This failure to perform a simple act mandated by California has the potential to cause
12 serious harm to those trying to buy or sell a home, as well as to title companies. This failure may prevent
13 the transfer of marketable title from a home seller to purchaser and prevent the completion of the sale.

14 5. Cal. Civ. Code § 2941(b)(1) requires that beneficiaries like Defendant execute and
15 deliver to designated trustees, among other documents, a request for reconveyance within thirty days
16 after the obligation secured by a deed of trust has been satisfied.

17 6. Cal. Civ. Code § 2941(b)(1)(A) requires that trustees execute and record, or cause to be
18 recorded, the reconveyance in the office of the appropriate county recorder within twenty-one days after
19 it is received from the beneficiary.

20 7. It is that filing that proves that an obligation secured by a deed of trust has been satisfied
21 and that the associated property is no longer subject to a lien.

22 8. A beneficiary or a trustee that fails to comply with its obligations under Cal. Civ. Code
23 § 2941 must forfeit \$500 to the affected party (the borrower).

24 9. This statute is a crucial mechanism by which California ensures that the acquisition and
25 transfer of real property occurs with efficiency and reliability.

26 10. Defendant, the beneficiary or trustee for thousands of homes in California, has
27 systematically failed to comply with its obligations under Cal. Civ. Code § 2941 and has failed to timely
28

1 execute, deliver, or record requests for reconvenyances or reconvenyances to discharge deeds of trust.

2 11. As a result, for each violation of Cal. Civ. Code § 2941 (either as a beneficiary or a
3 trustee), Defendant is liable for \$500.

4 12. Defendant is specifically liable to Plaintiff and each member of the putative class alleged
5 herein.

6 **JURISDICTION AND VENUE**

7 13. This Court has jurisdiction over the entire action by virtue of the fact that this is a civil
8 action wherein the matter in controversy, exclusive of interest and costs, exceeds the jurisdictional
9 minimum of the Court. The acts and omissions complained of in this action took place in the State of
10 California. Venue is proper because this is a class action, the acts or omissions complained of took place,
11 in whole or in part, within the venue of this Court.

12 **PARTIES**

13 14. Plaintiff Cecelia Anne Perkins resides in San Mateo County, California. She was the
14 trustor under the deed of trust at issue pertaining to real property located in San Mateo County,
15 California. She is also the trustee of the Cecelia Anne Perkins Living Trust dated January 6, 2016.

16 15. Upon information and belief, defendant Quicken Loans, Inc. is a corporation
17 incorporated under the laws of Michigan, with a principal place of business in Michigan. It was the
18 beneficiary and substituted trustee under the deed of trust at issue pertaining to real property located in
19 San Mateo County, California.

20 **OPERATIVE FACTS**

21 16. Defendant is the largest residential mortgage lender in the United States.

22 17. One of the unfortunate consequences of the consolidation of the banking industry is that
23 lenders are increasingly disconnected from the communities in which they offer and provide home loans.
24 As a result, mortgage lenders like Defendant frequently fail to comply with their obligations to timely
25 execute and record reconveyances when obligations secured by deeds of trust have been satisfied.

26 18. Defendant often records reconveyances or causes reconveyances to be recorded months,
27 if not years, after they are due. Sometimes a reconveyance is never recorded.

1 19. This failure to comply with legal obligations can wreak havoc for buyers and sellers of
2 homes, as well as for title companies. "Open" deeds of trust created by the failure to timely record
3 reconveyances result in difficulty passing marketable title from a seller to a purchaser. This can prevent
4 the completion of a property sale.

5 20. To address failures to record reconveyances in a timely manner, the California
6 Legislature implemented Cal. Civ. Code § 2941. This statute imposes a \$500 statutory liability upon
7 beneficiaries (such as lenders) where the request for a reconveyance and other necessary documents are
8 not executed and provided to the trustee within thirty days.

9 21. The statute also imposes a \$500 statutory liability upon trustees who do not execute a
10 reconveyance and submit it for recording within twenty-one days after a request for reconveyance.

11 22. On or about August 17, 2016, Plaintiff entered into a loan and deed of trust (the "Deed
12 of Trust") with Defendant with respect to property located in San Mateo County.

13 23. The property was owned by the Cecelia Anne Perkins Living Trust dated January 6, 2016.

14 24. Plaintiff is the trustee of the Cecelia Anne Perkins Living Trust dated January 6, 2016.

15 25. No later than May 24, 2017, this property was sold and the proceeds from that sale were
16 used to satisfy all amounts due to Defendant under the Deed of Trust

17 26. Thereafter, on or about May 31, 2017, Defendant executed a Substitution of Trustee and
18 Full Reconveyance (attached as Exhibit A), in which Defendant appointed itself as the trustee for
19 purposes of Cal. Civ. Code § 2941 and purported to reconvey all rights to the property.

20 27. However, Defendant did not record this document with the San Mateo County Recorder's
21 office until August 2, 2017 – at least 70 days after the sale of the property and the satisfaction of the
22 Deed of Trust. This was well after the time by which it had to be recorded under Cal. Civ. Code § 2941.

23 28. The San Mateo County Recorder's office records satisfactions of deeds of trust
24 expeditiously upon presentment.

25 29. In fact, upon information and belief, Defendant appears to routinely fail to timely execute
26 and record (or cause to be recorded) reconveyances in thousands of instances.

27 30. Within the past calendar year, Plaintiff discovered that Defendant failed to comply with
28

1 its Cal. Civ. Code § 2941 obligations. Prior to that time, Plaintiff was not aware that she were injured
2 by Defendant's failure to timely comply with its Cal. Civ. Code § 2941 obligations.

3 31. Plaintiff reasonably relied upon Defendant, as a professional, agent, and fiduciary, to
4 perform the services that it was required to perform. Plaintiff was not on notice of any facts or
5 information that would have required her to inquire into whether Defendant have fulfilled its duty.
6 Plaintiff reasonably expected that Defendant would perform its obligations under Cal. Civ. Code § 2941,
7 as required.

8 CLASS ACTION ALLEGATIONS

9 32. Plaintiff brings this action pursuant to Code of Civil Procedure § 382 and seeks to
10 represent the following class:

11 All persons or parties who were the trustor party to a deed of trust recorded in any
12 California county recorder's office for which Quicken Loan, Inc. was a beneficiary or a
13 trustee, where either: (1) as a beneficiary, Quicken Loan, Inc. failed to execute and deliver
14 to the trustee the original note, deed of trust, request for a full reconveyance, or other
15 documents required to delivered to the trustee under Cal. Civ. Code § 2941 within 30 days
16 after the obligation secured by the deed of trust was satisfied; or (2) as a trustee, Quicken
17 Loans, Inc. failed to execute the full reconveyance or failed to record the reconveyance or
18 failed to cause it to be recorded in the office of the county recorder in which the deed of
trust was recorded within 21 days after receipt of the original note, deed of trust, request
for a full reconveyance, the fee that may be charged pursuant to Cal. Civ. Code § 2941(e),
recorder's fees, and other documents as may be necessary to reconvey, or cause to be
reconveyed, the deed of trust (the "Class").

19 33. Upon information and belief, the scope of this class definition, including its temporal
20 scope, may be further refined after discovery of the records of Defendant or third parties.

21 34. Plaintiff's claims are typical of the claims of the Class. Plaintiff is a member of a well-
22 defined Class of similarly situated persons. All members of the Class are similarly affected by
23 Defendant's conduct and are owed the same statutory penalty. Members of the Class are ascertainable
24 from Plaintiff's description of the class or the records of Defendant or third parties accessible through
25 discovery.

26 35. Plaintiff will fairly and adequately represent the members of the Class and has no
27 interests that are antagonistic to the claims of the Class. Plaintiff will vigorously pursue the claims of
28

1 the Class.

2 36. Plaintiff has retained counsel who are competent and experienced in consumer and
3 mortgage related litigation, and who have successfully represented plaintiffs in complex class actions,
4 including class actions relating to lenders' failure to timely record reconveyances and other violations
5 by lenders of their obligations to borrowers.

6 37. Common questions of law and fact impact the rights of each member of the Class and a
7 common remedy is available in the form of permissible damages or injunctive relief sought for the
8 Class.

9 38. There are substantial questions of law and fact common to all members of the Class
10 that will predominate over any individual issues. These common questions of law and fact include:

11 a. whether Defendant failed to timely execute and record reconveyances or perform
12 other obligations required by Cal. Civ. Code § 2941; and

13 b. whether Defendant violated Cal. Civ. Code § 2941.

14 39. A class action provides a fair and efficient method, if not the only method, for
15 adjudicating this controversy. The substantive claims of Plaintiff and the Class are nearly identical and
16 will require evidentiary proof of the same kind and the application of the same law. There is no plain,
17 speedy, or adequate remedy available except through this class action.

18 40. A class action is superior to other available methods for the fair and efficient
19 adjudication of this controversy. Class members likely number in the thousands and individual joinder
20 is impracticable. The expense and burden of individual litigation would make it impracticable or
21 impossible for proposed Class members to prosecute their claims individually. The litigation and trial
22 of the claims of Plaintiff and the Class members is manageable. Unless the Class is certified,
23 Defendant will remain free to engage in this same wrongful conduct without consequence.

24 41. The Class members are so numerous that the joinder of all such members individually
25 in this case is impracticable. The disposition of their claims as part of a single class action, rather than
26 through thousands of individual lawsuits, will benefit the parties and greatly reduce the aggregate
27 required judicial resources.

42. Plaintiff knows of no difficulty that will be encountered in the management of this litigation that would preclude its maintenance as a class action.

FIRST CAUSE OF ACTION

Violation of Cal. Civ. Code § 2941, *et. seq.*

43. Plaintiff repeats and realleges all allegations set forth above as if fully set forth herein.

44. Cal. Civ. Code § 2941 provides that:

(b)(1) Within 30 calendar days after the obligation secured by any deed of trust has been satisfied, the beneficiary or the assignee of the beneficiary shall execute and deliver to the trustee the original note, deed of trust, request for a full reconveyance, and other documents as may be necessary to reconvey, or cause to be reconveyed, the deed of trust.

(A) The trustee shall execute the full reconveyance and shall record or cause it to be recorded in the office of the county recorder in which the deed of trust is recorded within 21 calendar days after receipt by the trustee of the original note, deed of trust, request for a full reconveyance, the fee that may be charged pursuant to subdivision (e), recorder's fees, and other documents as may be necessary to reconvey, or cause to be reconveyed, the deed of trust.

* * *

(d) The violation of this section shall make the violator liable to the person affected by the violation for all damages which that person may sustain by reason of the violation, and shall require that the violator forfeit to that person the sum of five hundred dollars (\$500).

45. Defendant failed to comply with its obligations under Cal. Civ. Code § 2941.

46. Defendant did not, within 30 calendar days after the obligation secured by Plaintiff's Deed of Trust had been satisfied, execute and deliver to the trustee the original note, deed of trust, request for a full reconveyance, and other documents as may be necessary to reconvey, or cause to be reconveyed, the Deed of Trust.

47. Defendant did not execute the full reconveyance and record or cause it to be recorded in the office of the county recorder in which the Deed of Trust is recorded within 21 calendar days after receipt of the original note, deed of trust, request for a full reconveyance, the fee that may be charged pursuant to Cal. Civ. Code § 2941(e), recorder's fees, and other documents as may be necessary to reconvey, or cause to be reconveyed, Plaintiff's Deed of Trust.

1 48. Defendant systematically failed to fulfill these same obligations with respect to the deeds
2 of trust of the Class members.

3 49. By reason of the foregoing, Defendant has violated Cal. Civ. Code Ann. § 2941.

4 50. With respect to each such violation, Defendant is liable to Plaintiff and Class members
5 for \$500, together with interest thereon.

6 **PRAYER FOR RELIEF**

7 WHEREFORE, Plaintiff and the Class pray for the following relief:

- 8 1. An Order certifying the proposed Class pursuant to Cal. Civ. Code § 382, requiring
9 notice to Class members to be paid by Defendant, and appointing Plaintiff and her
10 counsel to represent the Class;
- 11 2. An Order adjudging and decreeing that Defendant have engaged in the conduct alleged
12 herein;
- 13 3. An award of statutory damages in the amount of \$500 for each violation of Cal. Civ.
14 Code Ann. § 2941 committed by Defendant relating to deeds of trust to which Class
15 members were parties;
- 16 4. An award of pre and post-judgment interest at the maximum allowable rate on any
17 amounts awarded;
- 18 5. An Order awarding appropriate injunctive relief or declaratory relief, including, but not
19 limited to, an order requiring Defendants to timely execute and cause reconveyances to
20 be recorded;
- 21 6. An award of Plaintiff's costs and reasonable attorneys' fees; and
- 22 7. Such other and further relief as the Court deems just and proper, including, but not limited
23 to, exemplary damages.

24 **DEMAND FOR TRIAL BY JURY**

25 Plaintiff hereby demands trial by jury of all claims and causes of action in this lawsuit.
26
27
28

1 Dated: July 11, 2018



2 Jaimie Mak, Esq. (SBN 236505)
3 Kim E. Richman, Esq. (*pro hac vice* forthcoming)
4 **THE RICHMAN LAW GROUP**
5 81 Prospect Street
6 Brooklyn, New York 11201
7 Telephone: (718) 705-4579
8 Facsimile: (718) 228-8522

9 **FINKELSTEIN, BLANKINSHIP,**
10 **FREI-PEARSON & GARBER, LLP**
11 Todd S. Garber, Esq. (*pro hac vice* forthcoming)
12 D. Gregory Blankinship, Esq. (*pro hac vice* forthcoming)
13 Bradley F. Silverman, Esq. (*pro hac vice* forthcoming)
14 tgarber@fbfglaw.com
15 gblankinship@fbfglaw.com
16 bsilverman@fbfglaw.com
17 445 Hamilton Avenue, Suite 605
18 White Plains, NY 10605
19 Telephone: (914) 298-3281
20 Facsimile: (914) 824-1561

21 *Attorneys for Plaintiff and the Proposed Class*

EXHIBIT A

Recording Requested by &
When Recorded Mail To:
Robin Desaussure
Quicken Loans Inc.
635 Woodward Ave.
Detroit, MI 48226

Parcel No. 006-010-103-41

2017-066749

11:12 am 08/02/17 ST RE Fee: 33.00

Count of Pages: 1

Recorded In Official Records

County of San Mateo

Mark Church

Assessor-County Clerk-Recorder



* R 0 0 0 2 4 3 2 5 5 8 *

Substitution of Trustee and Full Reconveyance

Loan Number: 3360384058

The undersigned, present beneficiary under that certain Deed of Trust dated August 12, 2016, executed by CECELIA ANNE PERKINS, AN UNMARRIED WOMAN, as Trustors to MICHAEL LYON, as original Trustee for Mortgage Electronic Registration Systems, Inc., as nominee for QUICKEN LOANS INC., its successors and assigns, recorded on August 17, 2016, in Document No. 2016-082075, OR Book: --, PG: -- of official records of SAN MATEO County, California, hereby Appoints and Substitutes the undersigned as the new Substituted Trustee thereunder in accordance with the terms and provisions contained therein, whose address is 1050 Woodward Ave, Detroit, MI 48226-1906, and as such duly Appointed and Substituted Trustee thereunder, the undersigned does hereby Reconvey to the Person or Persons legally entitled thereto, without warranty, all the estate, title, and interest acquired by the Original Trustee and by the undersigned as the said Substituted Trustee under said Deed of Trust, wherever the text of this document so requires, the singular includes the plural.

Dated this May 31, 2017

SIGNED:

QUICKEN LOANS INC.

By: David Telega

Its: Authorized Agent

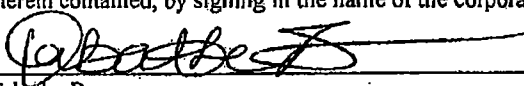
ACKNOWLEDGEMENT

STATE OF MICHIGAN)

ss

COUNTY OF WAYNE)

On May 31, 2017, before me, Tabatha Bronner, the above signed officer, David Telega, personally appeared and acknowledged to be the Authorized Agent of QUICKEN LOANS INC., and that is, authorized to, executed the foregoing instrument for the purposes therein contained, by signing in the name of the corporation by as QUICKEN LOANS INC..


Tabatha Bronner

Notary Public, State of Michigan, County Of MACOMB

My Commission Expires: March 26, 2019

Acting in the County of Wayne

Tabatha Bronner
Notary Public of Michigan
Macomb County
Expires 3/26/2019
Acting in the County of Wayne

MIN: 100039033603840582

MERS Phone: 1-888-679-6377



q03360384058 0942 054 0101

EXHIBIT 2b

EXHIBIT 2b

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):

QUICKEN LOANS, INC., a California corporation

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

CECELIA ANNE PERKINS, individually, as Trustee of the CECELIA ANNE PERKINS LIVING TRUST DATED JANUARY 6, 2016, and on behalf of all others similarly situated

18 - CIV - 03639
SUM
Summons Issued / Filed
1258514

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

FILED
SAN MATEO COUNTY

JUL 12 2018

Clerk of the Superior Court
By 
DEPUTY CLERK

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Superior Court of California, San Mateo
400 County Center
Redwood City, CA 94063

CASE NUMBER:
(Número del Caso):

18 CIV 03639

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Jaimie Mak, Esq., The Richman Law Group, 81 Prospect St., Brooklyn, NY 11201, (718) 705-4579

DATE: JUL 12 2018
(Fecha)

RODINA M. CATALANO
Clerk, by
(Secretario)

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☒ on behalf of (specify): Quicken Loans, Inc., a California corporation
under: ☒ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):
4. ☐ by personal delivery on (date):

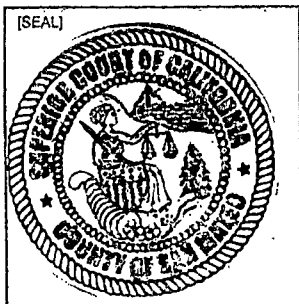


EXHIBIT 2c

EXHIBIT 2c

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Jaimie Mak, Esq. (SBN 236505), Kim E. Richman, Esq. (pro hac vice forthcoming) The Richman Law Group 81 Prospect Street, Brooklyn, NY 11201 TELEPHONE NO.: (718) 705-4579 FAX NO.: (718) 228-8522 ATTORNEY FOR (Name): Plaintiff, Cecelia Anne Perkins		FOR COURT USE ONLY <h1 style="margin: 0;">FILED</h1> <h2 style="margin: 0;">SAN MATEO COUNTY</h2> JUL 12 2018 Clerk of the Superior Court By DEPUTY CLERK	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Mateo STREET ADDRESS: 400 County Center MAILING ADDRESS: CITY AND ZIP CODE: Redwood City, CA 94063 BRANCH NAME: Southern Branch		CASE NUMBER: <h2 style="margin: 0;">18CIV03639</h2> JUDGE: DEPT:	
CASE NAME: Cecelia Anne Perkins, et al.v. Quicken Loans, Inc.			
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	

Items 1-6 below must be completed (see instructions on page 2).

BY FAX

1. Check one box below for the case type that best describes this case:		
Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input checked="" type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case ☒ is ☐ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|---|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input checked="" type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input checked="" type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify): one (violation of Cal. Civ. Code § 2941, et. seq.)
5. This case ☒ is ☐ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: July 11, 2018

Jaimie Mak, Esq.

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (not asbestos or toxic/environmental) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (not medical or legal)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (not unlawful detainer or wrongful eviction)
Contract/Warranty Breach—Seller
Plaintiff (not fraud or negligence)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (not provisionally complex) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (not eminent domain, landlord/tenant, or foreclosure)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (non-domestic relations)
Sister State Judgment
Administrative Agency Award (not unpaid taxes)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint


RICO (27)
Other Complaint (not specified above) (42)
Declaratory Relief Only
Injunctive Relief Only (non-harassment)
Mechanics Lien
Other Commercial Complaint Case (non-tort/non-complex)
Other Civil Complaint (non-tort/non-complex)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (not specified above) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

EXHIBIT 2d

EXHIBIT 2d

Attorney or Party without Attorney (Name/Address) Jaimie Mak, Esq. (SBN236505) Kim E. Richman, Esq. (<i>pro hac vice</i> forthcoming) The Richman Law Group, 81 Prospect St., Brooklyn, NY 11201 Telephone: (718) 705-4579 State Bar No.: SBN 236505 Attorney for: Plaintiff, Cecelia Anne Perkins, individually, as Trustee of the Cecelia Anne Perkins Living Trust dated January 6, 2016, and on behalf of all others similarly situated	FOR COURT USE ONLY <div style="text-align: center;"> FILED SAN MATEO COUNTY JUL 12 2018 Clerk of the Superior Court By <u><i>[Signature]</i></u> DEPUTY CLERK </div> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> 18 – CIV – 03639 CRCCD Certificate Re: Complex Case Designation 1258520  </div>
SUPERIOR COURT OF CALIFORNIA COUNTY OF SAN MATEO 400 COUNTY CENTER REDWOOD CITY, CA 94063	
Plaintiff CECELIA ANNE PERKINS, individually, as Trustee of the CECELIA ANNE PERKINS LIVING TRUST DATED JANUARY 6, 2016, and on behalf of all others similarly situated	
Defendant QUICKEN LOANS, INC., a California corporation	<div style="display: flex; justify-content: space-between;"> <div> Certificate Re Complex Case Designation </div> <div> Case Number 18 CIV 03639 </div> </div>

BY FAX

**This certificate must be completed and filed with your Civil Case Cover Sheet if
you have checked a Complex Case designation or Counter-Designation**

1. In the attached Civil Case Cover Sheet, this case is being designated or counter-designated as a complex case [or as not a complex case] because at least one or more of the following boxes has been checked:
 - ☐ Box 1 – Case type that is best described as being [or not being] provisionally complex civil litigation (i.e., antitrust or trade regulation claims, construction defect claims involving many parties or structures, securities claims or investment losses involving many parties, environmental or toxic tort claims involving many parties, claims involving mass torts, or insurance coverage claims arising out of any of the foregoing claims).
 - ☐ Box 2 – Complex [or not complex] due to factors requiring exceptional judicial management
 - ☒ Box 5 – Is [or is not] a class action suit.

2. This case is being so designated based upon the following supporting information [including, without limitation, a brief description of the following factors as they pertain to this particular case: (1) management of a large number of separately represented parties; (2) complexity of anticipated factual and/or legal issues; (3) numerous pretrial motions that will be time-consuming to resolve; (4) management of a large number of witnesses or a substantial amount of documentary evidence; (5) coordination with related actions

pending in one or more courts in other counties, states or countries or in a federal court; (6) whether or not certification of a putative class action will in fact be pursued; and (7) substantial post-judgment judicial supervision]:

This case is designated as complex based on a variety of factors, including that the legal and factual issues will be complex, there will likely be numerous pre-trial motions (potentially including a demurrer, motions for discovery compliance, motions for summary judgment, and a motion for class certification), there will be a large amount of documentary and data evidence, and because certification of the putative class will in fact be vigorously pursued.

(attach additional pages if necessary)

3. Based on the above-stated supporting information, there is a reasonable basis for the complex case designation or counter-designation [or noncomplex case counter-designation] being made in the attached Civil Case Cover Sheet.

I, the undersigned counsel or self-represented party, hereby certify that the above is true and correct and that I make this certification subject to the applicable provisions of California Code of Civil Procedure, Section 128.7 and/or California Rules of Professional Conduct, Rule 5-200 (B) and San Mateo County Superior Court Local Rules, Local Rule 2.30.

Dated: July 11, 2018

Jaimie Mak, Esq.

[Type or Print Name]



[Signature of Party of Attorney For Party]

EXHIBIT 2e

EXHIBIT 2e



NOTICE OF CASE MANAGEMENT CONFERENCE

CECELIA ANNE PERKINS, et al.

FILED
SAN MATEO COUNTY

Case No: **18 CIV 03639**

Vs.

JUL 12 2018

Date: **NOV 09 2018**

QUICKEN LOANS, INC., a California corporation

Clerk of the Superior Court Time: 9:00 AM

By

[Signature]
DEPUTY CLERK

Dept. _____

--on Tuesday & Thursday

Dept. 11

--on Wednesday & Friday

You are hereby given notice of your Case Management Conference. The date, time, and department have been written above.

1. In accordance with applicable California Rules of the Court and local Rules 2.3(d)1-4 and 2.3(m), you are hereby ordered to:
 - a. Serve all named defendants and file proofs of service on those defendants with the court within 60-days of filing the complaint (CRC 201.7).
 - b. Serve a copy of this notice, Case Management Statement and ADR Information Sheet on all named parties in this action.
 - c. File and serve a completed Case Management Statement at least 15-days before the Case Management Conference [CRC212(g)]. Failure to do so may result in monetary sanctions.
 - d. Meet and confer, in person or by telephone, to consider each of the issues identified in CRC212(f) no later than 30-days before the date set for the Case Management Conference.

2. If you fail to follow the orders above, you are ordered to show cause why you should not be sanctioned. The Order to Show Cause hearing will be at the same time as the Case Management Conference hearing. Sanctions may include monetary, evidentiary or issue sanctions as well as striking pleadings and/or dismissal.

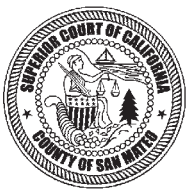
3. Continuances of Case Management Conferences are highly disfavored unless good cause is shown.
4. Parties may proceed to an appropriate dispute resolution process ("ADR") by filing a Stipulation to ADR and Proposed Order (see attached form). If plaintiff files a Stipulation to ADR and Proposed Order electing to proceed to judicial arbitration, the Case Management Conference will be taken off the court calendar and the case will be referred to the Arbitration Administrator. If plaintiffs and defendants file a completed stipulation to another ADR process (e.g., mediation) 10-days prior to the first scheduled Case Management Conference, the Case Management Conference will be continued for 90-days to allow parties time to complete their ADR session. The court will notify parties of their new Case Management Conference date.
5. If you have filed a default or a judgment has been entered, your case is not automatically taken off Case Management Conference Calendar. If "Does", "Roes", etc. are named in your complaint, they must be dismissed in order to close the case. If any party is in bankruptcy, the case is stayed only as to that named party.
6. You are further ordered to appear in person* (or through your attorney of record) at the Case Management Conference noticed above. You must be thoroughly familiar with the case and fully authorized to proceed.
7. The Case Management judge will issue orders at the conclusion of the conference that may include:
 - a. Referring parties to voluntary ADR and setting an ADR completion date;
 - b. Dismissing or severing claims or parties;
 - c. Setting a trial date.
8. The Case Management judge may be the trial judge in this case.

For further information regarding case management policies and procedures, see the court's website at: www.sanmateocourt.org

*Telephonic appearances at case management conferences are available by contacting CourtCall, LLC, an independent vendor, at least five business days prior to the scheduled conference (see attached CourtCall information).

EXHIBIT 2f

EXHIBIT 2f



SUPERIOR COURT OF SAN MATEO COUNTY

Civil Department
400 County Center, Redwood City, CA 94063
(650) 261-5100
www.sanmateocourt.org

CECELIA ANNE PERKINS Plaintiff (s) vs. QUICKEN LOANS, INC., A CALIFORNIA CORPORATION Defendant (s)	Notice of Complex Case Status Conference Case No.: 18-CIV-03639 Date: 9/11/2018 Time: 9:00 AM Dept. PJ
Title: CECELIA ANNE PERKINS VS. QUICKEN LOANS, INC., A CALIFORNIA CORPORATION	

You are hereby given notice of your Complex Case Status Conference. The date, time and department have been written above. At this conference, the Presiding Judge will decide whether this action is a complex case within the meaning of California Rules Court ("CRC"), Rule 3.400, subdivision (a) and whether it should be assigned to a single judge for all purposes.

1. In accordance with applicable **San Mateo County Local Rule 2.30**, you are hereby ordered to:
 - a. **Serve** copies of this notice, your Civil Case Cover Sheet, and your Certificate Re: Complex Case Designation on all named parties in this action no later than service of your first appearance pleadings.
 - b. **Give reason notice** of the Complex Case Status Conference to all named parties in this action, even if they have not yet made a first appearance or been formally served with the documents listed in subdivision (a). Such notice shall be given in the same manner as required for an ex parte application pursuant to CRC 3.1203.
2. **If you fail to follow the orders above, you are ordered to show cause why you should not be sanctioned. The Order to Show Cause hearing will be at the same time as the Complex Cause Status Conference. Sanctions may include monetary, evidentiary or issue sanctions as well as striking pleadings and/or dismissal.**
3. An action is provisionally a complex case if it involves one or more of the following types of claims: (1) antitrust or trade regulation claims; (2) construction defect claims involving many parties or structures; (3) securities claims or investment losses involving many parties; (4) environmental or toxic tort claims involving many parties; (5) claims involving massive torts; (6) claims involving class actions; or (7) insurance coverage claims arising out of any of the claims listed in subdivisions (1) through (6). The Court shall treat a provisionally complex action as a complex case until the Presiding Judge has the opportunities to decide whether the action meets the definition in CRC 3.400(a).
4. Any party who files either a Civil Case Cover Sheet (pursuant to CRC 3.401) or counter or joinder Civil Case Cover Sheet (pursuant to CRC 3.402, subdivision (b) or (C)), designating an action as a complex case in Items 1,2 and/or 5, must also file an accompanying Certificate Re: Complex Case Designation in the form prescribed by the Court. The certificate must include supporting information showing a reasonable basis for the complex case designation being sought. Such supporting information may include, without limitation, a brief description of the following factors as they pertain to the particular action: (1) management of a large number of separately represented parties; (2) complexity of anticipated factual and/or legal issues; (3) numerous pretrial motions that will be time-consuming to resolve; (4) management of a large number of witnesses or a substantial amount of documentary evidence; (5) coordination with related actions pending in one or more courts in other counties, states or countries or in a federal court; (6) whether or not certification of a putative class action will in fact be pursued; and (7) substantial post-judgment judicial supervision.

For further information regarding case management policies and procedures, see the court website at www.sanmateocourt.org

* Telephone appearances at Complex Case Status Conference are available by contacting CourtCall, LLC, and independent vendor, at least 5 business days prior to the scheduled conference.

CLERK'S CERTIFICATE OF MAILING

I hereby certify that I am the clerk of this court, not a party of this cause; that I served a copy of this notice on the below date, by placing a copy thereof in separate sealed envelopes addressed to the address shown by the records of this court as set forth above, and by then sealing said envelopes and depositing same, with postage fully pre-paid thereon, in the United States Mail at Red wood City, California.

Date: 7/12/2018

Rodina M. Catalano,
Court Executive Officer/Clerk

By: _____

Brooke Jimenez,
Deputy Clerk

Copies mailed to:

CECELIA ANNE PERKINS
NO KNOWN ADDRESS

QUICKEN LOANS INC A CALIFORNIA CORPORATION
NO KNOWN ADDRESS

JAIME MAK
RICHMAN LAW GROUP
535 MISSION ST
SAN FRANCISCO CA 94105

EXHIBIT 2g

EXHIBIT 2g



SUPERIOR COURT OF SAN MATEO COUNTY

Civil Department
400 County Center, Redwood City, CA 94063
(650) 261-5100
www.sanmateocourt.org

CECELIA ANNE PERKINS

Plaintiff (s)

vs.

**QUICKEN LOANS, INC., A CALIFORNIA
CORPORATION**

Defendant (s)

Notice of Complex Case Status Conference

Case No.: 18-CIV-03639

Date: **9/11/2018**

Time: **9:00 AM**

Dept. PJ

18 - CIV - 03639

NCCSC

Notice of Complex Case Status Conference
1258531

Title: **CECELIA ANNE PERKINS VS. QUICKEN LOANS, INC., A CALIFORNIA CORPORATION**



You are hereby given notice of your Complex Case Status Conference. The date, time and department have been written above. At this conference, the Presiding Judge will decide whether this action is a complex case within the meaning of California Rules Court ("CRC"), Rule 3.400, subdivision (a) and whether it should be assigned to a single judge for all purposes.

1. In accordance with applicable **San Mateo County Local Rule 2.30**, you are hereby ordered to:
 - a. **Serve** copies of this notice, your Civil Case Cover Sheet, and your Certificate Re: Complex Case Designation on all named parties in this action no later than service of your first appearance pleadings.
 - b. **Give reason notice** of the Complex Case Status Conference to all named parties in this action, even if they have not yet made a first appearance or been formally served with the documents listed in subdivision (a). Such notice shall be given in the same manner as required for an ex parte application pursuant to CRC 3.1203.
2. **If you fail to follow the orders above, you are ordered to show cause why you should not be sanctioned. The Order to Show Cause hearing will be at the same time as the Complex Cause Status Conference. Sanctions may include monetary, evidentiary or issue sanctions as well as striking pleadings and/or dismissal.**
3. An action is provisionally a complex case if it involves one or more of the following types of claims: (1) antitrust or trade regulation claims; (2) construction defect claims involving many parties or structures; (3) securities claims or investment losses involving many parties; (4) environmental or toxic tort claims involving many parties; (5) claims involving massive torts; (6) claims involving class actions; or (7) insurance coverage claims arising out of any of the claims listed in subdivisions (1) through (6). The Court shall treat a provisionally complex action as a complex case until the Presiding Judge has the opportunities to decide whether the action meets the definition in CRC 3.400(a).
4. Any party who files either a Civil Case Cover Sheet (pursuant to CRC 3.401) or counter or joinder Civil Case Cover Sheet (pursuant to CRC 3.402, subdivision (b) or (C)), designating an action as a complex case in Items 1,2 and/or 5, must also file an accompanying Certificate Re: Complex Case Designation in the form prescribed by the Court. The certificate must include supporting information showing a reasonable basis for the complex case designation being sought. Such supporting information may include, without limitation, a brief description of the following factors as they pertain to the particular action: (1) management of a large number of separately represented parties; (2) complexity of anticipated factual and/or legal issues; (3) numerous pretrial motions that will be time-consuming to resolve; (4) management of a large number of witnesses or a substantial amount of documentary evidence; (5) coordination with related actions pending in one or more courts in other counties, states or countries or in a federal court; (6) whether or not certification of a putative class action will in fact be pursued; and (7) substantial post-judgment judicial supervision.

For further information regarding case management policies and procedures, see the court website at www.sanmateocourt.org

* Telephone appearances at Complex Case Status Conference are available by contacting CourtCall, LLC, and independent vendor, at least 5 business days prior to the scheduled conference.

CLERK'S CERTIFICATE OF MAILING

I hereby certify that I am the clerk of this court, not a party of this cause; that I served a copy of this notice on the below date, by placing a copy thereof in separate sealed envelopes addressed to the address shown by the records of this court as set forth above, and by then sealing said envelopes and depositing same, with postage fully pre-paid thereon, in the United States Mail at Red wood City, California.

Date: 7/12/2018

Rodina M. Catalano,
Court Executive Officer/Clerk

By: _____
Brooke Jimenez,
Deputy Clerk

Copies mailed to:

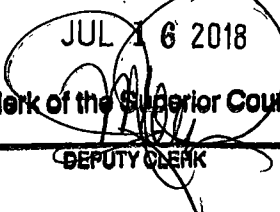
JAIME MAK
RICHMAN LAW GROUP
535 MISSION ST
SAN FRANCISCO CA 94105

EXHIBIT 2h

EXHIBIT 2h

9/11
PJ LM

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Kim Richman, 629960 The Richman Law Group 81 Prospect Street Brooklyn, NY 11201 TELEPHONE NO.: (718) 705-4579 ATTORNEY FOR (Name): Plaintiff		FILED FOR COURT USE ONLY SAN MATEO COUNTY JUL 16 2018 Clerk of the Superior Court By  DEPUTY CLERK
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Superior Court of California, San Mateo County 400 County Center Redwood City, CA 94063-1655		
PLAINTIFF/PETITIONER: CECILIA ANNE PERKINS, et al. DEFENDANT/RESPONDENT: QUICKEN LOANS, INC., a California corporation		CASE NUMBER: 18CIV03639
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.: None

- At the time of service I was a citizen of the United States, at least 18 years of age and not a party to this action.
- I served copies of: **Summons; Complaint; Civil Case Cover Sheet; Certificate Re Complex Case Designation; Notice of Case Management Conference**

3. a. Party served: QUICKEN LOANS, INC., a California corporation

b. Person Served: CT Corporation System - Carlos Paz - Person Authorized to Accept Service of Process

4. Address where the party was served: 818 West Seventh Street, Suite 930
Los Angeles, CA 90017

5. I served the party

a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): 07/12/2018 (2) at (time): 3:00PM

6. The "Notice to the Person Served" (on the summons) was completed as follows:

d. on behalf of:

QUICKEN LOANS, INC., a California corporation
under: CCP 416.10 (corporation)

7. **Person who served papers**

a. Name: Jimmy Lizama
b. Address: One Legal - 194-Marin
504 Redwood Blvd #223
Novato, CA 94947

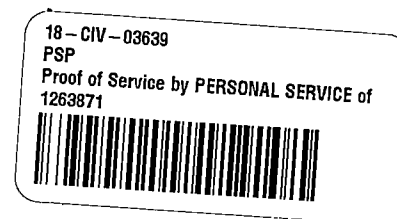
c. Telephone: 415-491-0606

d. The fee for service was: \$ 0.00

e I am:

- (3) registered California process server.
(i) Employee or independent contractor.
(ii) Registration No.: 4553
(iii) County: Los Angeles

8. I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.
Date: 07/13/2018



Jimmy Lizama
(NAME OF PERSON WHO SERVED PAPERS)

(SIGNATURE)

EXHIBIT 2i

EXHIBIT 2i



Superior Court of California
County of San Mateo
400 County Center, 1st Floor
Redwood City, CA 94063-1655

TS #65 MAILED AT 951 **07/13/18**

neopost

FIRST-CLASS MAIL
AUTO

07/12/2018

US POSTAGE \$000.42



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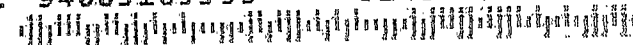
RTS

Jaime Mak

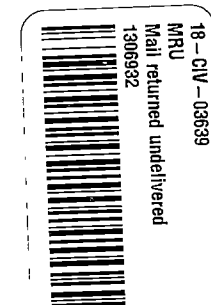
NIXIE 957 FE 1036 0007/31/18

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

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18-CIV-03639
MFU
Mail returned undelivered
1306932



SUPERIOR COURT OF SAN MATEO COUNTY

Civil Department
400 County Center, Redwood City, CA 94063
(650) 261-5100
www.sanmateocourt.org

CECELIA ANNE PERKINS Plaintiff (s) vs. QUICKEN LOANS, INC., A CALIFORNIA CORPORATION Defendant (s)	Notice of Complex Case Status Conference Case No.: 18-CIV-03639 Date: 9/11/2018 Time: 9:00 AM Dept. PJ
Title: CECELIA ANNE PERKINS VS. QUICKEN LOANS, INC., A CALIFORNIA CORPORATION	

You are hereby given notice of your Complex Case Status Conference. The date, time and department have been written above. At this conference, the Presiding Judge will decide whether this action is a complex case within the meaning of California Rules Court ("CRC"), Rule 3.400, subdivision (a) and whether it should be assigned to a single judge for all purposes.

1. In accordance with applicable **San Mateo County Local Rule 2.30**, you are hereby ordered to:
 - a. **Serve** copies of this notice, your Civil Case Cover Sheet, and your Certificate Re: Complex Case Designation on all named parties in this action no later than service of your first appearance pleadings.
 - b. **Give reason notice** of the Complex Case Status Conference to all named parties in this action, even if they have not yet made a first appearance or been formally served with the documents listed in subdivision (a). Such notice shall be given in the same manner as required for an ex parte application pursuant to CRC 3.1203.
2. **If you fail to follow the orders above, you are ordered to show cause why you should not be sanctioned. The Order to Show Cause hearing will be at the same time as the Complex Cause Status Conference. Sanctions may include monetary, evidentiary or issue sanctions as well as striking pleadings and/or dismissal.**
3. An action is provisionally a complex case if it involves one or more of the following types of claims: (1) antitrust or trade regulation claims; (2) construction defect claims involving many parties or structures; (3) securities claims or investment losses involving many parties; (4) environmental or toxic tort claims involving many parties; (5) claims involving massive torts; (6) claims involving class actions; or (7) insurance coverage claims arising out of any of the claims listed in subdivisions (1) through (6). The Court shall treat a provisionally complex action as a complex case until the Presiding Judge has the opportunities to decide whether the action meets the definition in CRC 3.400(a).
4. Any party who files either a Civil Case Cover Sheet (pursuant to CRC 3.401) or counter or joinder Civil Case Cover Sheet (pursuant to CRC 3.402, subdivision (b) or (C)), designating an action as a complex case in Items 1,2 and/or 5, must also file an accompanying Certificate Re: Complex Case Designation in the form prescribed by the Court. The certificate must include supporting information showing a reasonable basis for the complex case designation being sought. Such supporting information may include, without limitation, a brief description of the following factors as they pertain to the particular action: (1) management of a large number of separately represented parties; (2) complexity of anticipated factual and/or legal issues; (3) numerous pretrial motions that will be time-consuming to resolve; (4) management of a large number of witnesses or a substantial amount of documentary evidence; (5) coordination with related actions pending in one or more courts in other counties, states or countries or in a federal court; (6) whether or not certification of a putative class action will in fact be pursued; and (7) substantial post-judgment judicial supervision.

RECEIVED
SANMATEO COUNTY

AUG - 7 2018

Clerk of the Superior Court

BY
 Clerk

For further information regarding case management policies and procedures, see the court website at www.sanmateocourt.org

* Telephone appearances at Complex Case Status Conference are available by contacting CourtCall, LLC, and independent vendor, at least 5 business days prior to the scheduled conference.

CLERK'S CERTIFICATE OF MAILING

I hereby certify that I am the clerk of this court, not a party of this cause; that I served a copy of this notice on the below date, by placing a copy thereof in separate sealed envelopes addressed to the address shown by the records of this court as set forth above, and by then sealing said envelopes and depositing same, with postage fully pre-paid thereon, in the United States Mail at Red wood City, California.

Date: 7/12/2018

Rodina M. Catalano,
Court Executive Officer/Clerk

By: **BROOKE N. JIMENEZ**
Brooke Jimenez,
Deputy Clerk

Copies mailed to:

JAIME MAK
RICHMAN LAW GROUP
535 MISSION ST
SAN FRANCISCO CA 94105

EXHIBIT 2j

EXHIBIT 2j

Case Information

18-CIV-03639 | CECELIA ANNE PERKINS vs. QUICKEN LOANS, INC., A CALIFORNIA CORPORATION

Case Number	Court	
18-CIV-03639	Civil Unlimited	
File Date	Case Type	Case Status
07/12/2018	(42) Unlimited Other Complaint (Not Spec)	Active

Party

Plaintiff	Active Attorneys▼
PERKINS, CECELIA ANNE	Lead Attorney
Aliases	MAK, JAIME
TRE AS TRUSTEE OF THE CECELIA ANNE PERKINS LIVING TRUST DATED JANUARY 6, 2016	Retained
Defendant	
QUICKEN LOANS, INC., A CALIFORNIA CORPORATION	

Cause of Action

File Date	Cause of Action	Type	Filed By	Filed Against
07/12/2018	Complaint	Action	PERKINS, CECELIA ANNE	QUICKEN LOANS, INC., A CALIFORNIA CORPORATION

Events and Hearings

07/12/2018 New Filed Case	
07/12/2018 Complaint ▼	
Complaint	
07/12/2018 Summons Issued / Filed ▼	
Summons Issued / Filed	
07/12/2018 Civil Case Cover Sheet ▼	
Civil Case Cover Sheet	
07/12/2018 Certificate Re: Complex Case Designation ▼	
Certificate Re: Complex Case Designation	
07/12/2018 Notice of Case Management Conference ▼	
Notice of Case Management Conference	
07/12/2018 Notice of Complex Case Status Conference ▼	
Notice of Complex Case Status Conference	
07/12/2018 Cause Of Action ▼	
Action	File Date
Complaint	07/12/2018
07/16/2018 Proof of Service by PERSONAL SERVICE of ▼	

Proof of Service by PERSONAL SERVICE of SUMMONS, COMPLAINT, CIVIL CASE COVER SHEET, CERTIFICATE RE C

Comment
SUMMONS, COMPLAINT, CIVIL CASE COVER SHEET, CERTIFICATE RE COMPLEX CASE DESIGNATION, NOTICE OF CASE MANAGEMENT CONFERENCE SERVED ON CARLOS PAZ, PERSON AUTHORIZED TO ACCEPT SERVICE OF PROCESS

08/07/2018 Mail returned undelivered ▼

Mail returned undelivered Document: NOTICE OF COMPLEX CASE STATUS CONFERENCE Reason: NOT DELIVERABL

Comment
Document: NOTICE OF COMPLEX CASE STATUS CONFERENCE Reason: NOT DELIVERABLE AS ADRESSED, UNABLE TO FORWARD

09/11/2018 Complex Case Status Conference ▼

Judicial Officer
Master Calendar, -

Hearing Time
9:00 AM

11/09/2018 Case Management Conference ▼

Judicial Officer
Case Management Conferences, -

Hearing Time
9:00 AM

Financial

PERKINS, CECELIA ANNE		
Total Financial Assessment		\$1,435.00
Total Payments and Credits		\$1,435.00
7/12/2018 Transaction		\$435.00
Assessment		

7/12/2018	Transaction			\$1,000.00
	Assessment			
7/12/2018	Case	Receipt #	ONE	(\$1,435.00)
	Payment	2018-046641-	LEGAL	
		HOJ	LLC	

Documents

Notice of Complex Case Status Conference

Notice of Complex Case Status Conference

Certificate Re: Complex Case Designation

Notice of Case Management Conference

Complaint

Summons Issued / Filed

Civil Case Cover Sheet

Proof of Service by PERSONAL SERVICE of SUMMONS, COMPLAINT,
CIVIL CASE COVER SHEET, CERTIFICATE RE C

Mail returned undelivered Document: NOTICE OF COMPLEX CASE
STATUS CONFERENCE Reason: NOT DELIVERABL